

1 ANTHONY L. MARTIN  
2 Nevada Bar No. 8177  
3 anthony.martin@ogletreedeakins.com  
4 ERICA J. CHEE  
5 Nevada Bar No. 12238  
6 erica.chee@ogletreedeakins.com  
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
8 Wells Fargo Tower  
Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: 702.369.6800  
Fax: 702.369.6888

9 *Attorneys for Plaintiff*  
10 *BrandSafway Services, LLC*

11  
12 **UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

13 BRANDSAFWAY SERVICES, LLC,

14 Plaintiff,  
15 vs.  
16 LABORERS INTERNATIONAL UNION  
17 OF NORTH AMERICA, LOCAL 169,  
18 Defendants.

Case No.: 3:20-cv-00362-MMD-CLB

19  
20 **STIPULATION AND ORDER FOR**  
**EXTENSION OF TIME FOR PLAINTIFF'S**  
**OPPOSITION AND DEFENDANT'S**  
**REPLY TO MOTION TO STAY AND**  
**MOTION TO COMPEL ARBITRATION**

21  
22 *(Second Request)*

23 Pursuant to Rules LR IA 6-1, LR IA, 6-2, LR 7-1 and LR 7-2, Plaintiff BrandSafway  
24 Services, LLC ("Plaintiff") and Defendant Laborers International Union of North America, Local  
25 169 ("Defendant") by and through their respective undersigned counsel, hereby stipulate and agree  
26 to their second request for a two-week extension of time, up to and including, **Thursday, September**  
27 **17, 2020** for Plaintiff to respond to Defendant's Motion to Compel Arbitration (ECF No. 7) and  
28 Motion to Stay the Case (ECF No. 8), and a one-week extension of time, up to and including,  
**Thursday, October 1, 2020** for Defendant to file its Reply in support of its Motion to Compel  
Arbitration and Motion to Stay the Case. The responses to both motions are currently due Thursday,  
September 10, 2020, and the replies to both motions were scheduled for September 17, 2020..

1 Good cause exists to extend the deadline for the extension. Plaintiff's counsel was  
2 unexpectedly out of the office and Plaintiff's representative with knowledge on the factual  
3 background of this matter was out of the office until immediately prior to Labor Day Weekend. With  
4 such fact intensive history involved in the motion, the extended time to file an opposition and reply  
5 is warranted. As such, the parties stipulate to the extensions to afford both parties additional time to  
6 respond.

7 The stipulation is made in good faith and not for purposes of delay.  
8

9 DATED this 8 day of September, 2020.

10 LAW OFFICES OF MICHAEL E. LANGTON

11 */s/ Michael E. Langton*  
12 Michael E. Langton  
13 Nevada Bar No. 290  
14 801 Riverside Drive  
15 Reno, NV 89503  
16 Attorney for Defendant

DATED this 8<sup>th</sup> day of September, 2020.

17 OGLETREE, DEAKINS, NASH, SMOAK &  
18 STEWART, P.C.

19 */s/ B.K.*  
20 Anthony L. Martin  
21 Nevada Bar No. 8177  
22 Erica J. Chee  
23 Nevada Bar No. 12238  
24 Suite 1500  
25 3800 Howard Hughes Parkway  
26 Las Vegas, NV 89169  
27 Attorneys for Plaintiff

28 IT IS SO ORDERED.

ORDER



UNITED STATES DISTRICT JUDGE

September 8, 2020

DATED